



## Program Requirements Comparison

### NATIONAL ENVIRONMENTAL PERFORMANCE TRACK and MASSACHUSETTS ENVIRONMENTAL STEWARDSHIP PROGRAM



National Environmental Performance Track and Massachusetts Environmental Stewardship Program are voluntary programs designed to foster and reward environmental excellence. Performance Track is a national EPA program and Massachusetts Environmental Stewardship Program is a statewide Executive Office of Environmental Affairs program. This fact sheet summarizes and compares requirements for the Performance Track Program and the Leaders Tier of Massachusetts' Environmental Stewardship Program. For additional information on these programs or incentives, see program web sites or contact program coordinators.

#### Common Program Requirements:

- **EMS Components:** Five required elements include: an EMS with a written policy; planned targets and goals; clear roles and responsibilities for meeting goals; plans for checking and correcting non-conformance issues; and documented management review.
- **EMS Audit/Self-Assessment:** A self-assessment or third party EMS audit is to have taken place at the time of application.
- **EMS Cycle:** Requires one full cycle including implementation, evaluation, and review.
- **Past Performance:** Requires demonstration of performance improvements in the past 2 years within 2 specific environmental aspects.
- **Future Performance:** Requires a commitment to future performance improvements in 4 aspects from at least two unique categories.
- **Community Outreach:** Requires a plan to identify and respond to local concerns and inform community of important matters that affect it.
- **Community References:** Community references are required (e.g., member of a citizen group, union, local agency).
- **Annual Report:** Report must include EMS data, documentation that corrective action has been taken to address compliance and other EMS issues, and progress toward meeting goals. Reports must be made available to the public.
- **Compliance Record:** Facility must have fewer than 3 significant civil violations and no unresolved SNCs/SVs (or comparable high level or unresolved enforcement actions as described in MADEP's Enforcement Response Guidance), as well as no criminal environmental violations for 5 years. Facilities with ongoing EPA litigation or EPA debarment are ineligible.
- **Self-Certification:** Compliance self-certification is required on application and on annual reports.
- **Self-Audits:** Annual EMS and compliance audits are required.
- **Site Visits:** Periodic site visits are conducted as part of the program.
- **Duration of Participation:** Membership is for three years.

#### Massachusetts Environmental Stewardship-Leaders Tier - Additional Requirements:

- **EMS Audit/Self-Assessment:** Requires proof that EMS has been independently audited by a party not directly involved in facility operations.
- **Self-Certification:** Requires that all related facilities in Massachusetts are in substantial environmental compliance (to the best of the applicant's knowledge).
- **Past Performance:** Applicant must demonstrate resource conservation or source reduction in at least one category. Facilities subject to TURA must address progress towards toxics use reduction.
- **Future Performance:** Requires two of the four commitments to be to resource conservation or source reduction.
- **Site Visits:** Site visits conducted at all accepted facilities.

#### Performance Track - Additional Requirements:

- **Scalability:** Requirements are scalable and goals are expected to reflect the size of the facility.

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